

**LETTER FROM NATIONAL GRANTEES REGARDING DATA  
VALIDATION**

To: Judith Gilbert, Federal Project Officer

From: AARP  
Asociacion Nacional Pro Personas Mayores (ANPPM)  
Easter Seals, Inc (ES)  
Experience Works, Inc (EW)  
Goodwill Industries International, Inc (GII)  
Institute for Indian Development, Inc (IID)  
Mature Services, Inc (MS)  
National Able Network (NAN)  
National Asian Pacific Center on Aging (NAPCA)  
National Caucus and Center on Black Aged, Inc (NCCBA)  
National Council on the Aging, Inc (NCOA)  
National Indian Council on Aging (NICOA)  
National Urban League, Inc (NUL)  
Quality Career Services, Inc (QCSI)  
Senior Service America, Inc (SSAI)  
SER-Jobs for Progress, Inc (SER)  
The Workplace, Inc (TWI)  
Vermont Associates for Training and Development, Inc (VATD)

CC: Chris Ollis, Chief, Division of Adult Services  
Alexandra Kielty, Division of Adult Services  
Phil Hostetter, US Department of Labor  
Chantal Watler, FPO  
Elaine Allen, FPO  
Celeste Moerle, FPO  
Susan Desmond, FPO  
Trevor Capon, FPO  
Corey Bullock, FPO

Date: May 12, 2008

RE: SCSEP national grantee feedback on common measures

PY 2007 is the first year that national grantees have operated SCSEP under ETA's common measures. Also this year, the grantees piloted the SCSEP data validation procedures. As a result, we are concerned that PY2007 grantee performance report--based on the current application of common measures to SCSEP -- will not fully and accurately portray to Congress and others how SCSEP is performing its mission as stated in the Older Americans Act.

Our collective experience this year strongly suggests that the Department reconsider its current implementation of the Entered Employment Rate measure. Specifically, we request that DOL modify its approach to (1) excluding specific types of exited participants from the performance measures and (2) validating participant exits due to

health/medical and family care reasons. This would parallel DOL's approach to WIA youth and farmworker programs.

If not addressed, the current DOL policy will have the unintended negative effect of under-reporting SCSEP grantee performance on the Entered Employment Rate. In our opinion, this unintended effect is due to SCSEP's unique features which are not found under WIA. Namely, the Older Americans Act requires SCSEP grantees to:

- restrict services to low-income older adults most-in-need (WIA is a universal not targeted delivery system);
- recertify continued eligibility of participants due to possible changes in their family income (WIA has no similar requirement); and
- enforce time limits on participation (WIA has no similar requirement).

#### **Further Analysis.**

1. **Excluding exited participants from the performance measures.** We ask DOL to consider excluding the following types of participant exits from counting toward the Entered Employment Rate and other common measures:
  - a. Exits due to durational limits.
  - b. Exits as a result of ineligibility due to income determined during annual recertification.
  - c. Exits of participants temporarily enrolled and dependent on availability of PWFB funds.

Each of these exits are required by the Older Americans Act, are unique to SCSEP, and beyond the control of the grantees.

2. **Validating participant exits due to health/medical and family care reasons.** Since grantees are required to serve low-income older adults most in need, many SCSEP participants and their families have limited or no access to physicians or other health care providers. It is neither reasonable nor feasible to require documentation from a physician to validate exits for health/medical or family care reasons. We recommend that a case management note reflecting on-going interaction between the participant and SCSEP staff be acceptable as adequate validation of this data element.